1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 UNITED STATES OF AMERICA, CR20-054 RAJ NO. 10 Plaintiff, 11 INFORMATION 12 v. 13 THOMASINA GALLISHAW 14 a/k/a Thomasina Lundy, 15 Defendant. 16 17 The United States Attorney charges that: 18 19 COUNT 1 20 (Theft of Public Funds) Beginning in or about August 2013, and continuing through about June 2019, at 21 King County, within the Western District of Washington, and elsewhere, the defendant, 22 23 THOMASINA GALLISHAW, did willfully and knowingly embezzle, steal and convert to her own use and the use of another money of the United States, namely Social Security 24 benefits having an aggregate value of approximately fifty-nine thousand dollars 25 (\$59,000), with the intent to deprive the United States of the use and benefit of that 26 27 money. All in violation of Title 18, United States Code, Section 641. 28

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UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970 1 2

ASSET FORFEITURE ALLEGATION

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The allegations contained in Count 1 of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of the offense charged in Count 1 of this Information, the Defendant, THOMASINA GALLISHAW, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including but not limited to a judgement for a sum of money representing the proceeds the Defendant obtained as a result of the offense.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the Defendant,

- 1. cannot be located upon the exercise of due diligence;
- 2. has been transferred or sold to, or deposited with a third party;
- 3. has been placed beyond the jurisdiction of the Court;
- 4. has been substantially diminished in value; or,
- 5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek the forfeiture of any other property of the Defendant up to the value of the

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1	above-described forfeitable property.
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4	DATED: This day of April, 2020
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7	BRIAN T. MORAN United States Attorney
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10	S. KATE VAUGHAN
11	Assistant United States Attorney
12	Z XIDin
13	BENJAMIN T. DIGGS
14	Special Assistant United States Attorney
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